

REMARKS

Claims 1-20 are pending in the application. All claims stand under final rejection.

Applicants would like to thank the Examiner for withdrawing the title objection.

With regard to the rejections of claims 1-9 under 35 U.S.C. §112, second paragraph for indefiniteness, Applicants have made a clarifying amendment to independent claim 1 regarding the initial and first steering wheel "angle" inputs. Accordingly, in view of this clarifying amendment, Applicants respectfully request that the rejections under 35 U.S.C. §112 be withdrawn.

Applicants would like to thank the Examiner for withdrawing the rejection under 35 U.S.C. §101.

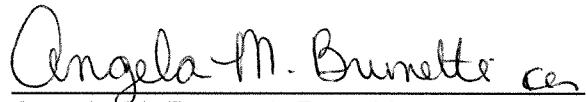
Claims 1, 3, 4, 8-10, 12-13 and 17-18 stand rejected under 35 U.S.C. §102 as being anticipated by Rossetter. Applicants traverse the rejections and submit that a *prima facie* case of anticipation has not been established. Specifically, Applicants at least traverse the suggestion in the Office Action that the Rossetter reference discloses or suggests **determining** an initial steering wheel input to the computer model. The Examiner directed Applicants' attention to page 8 of Rossetter, first full paragraph where Rossetter discloses setting initial inputs to zero. It is respectfully asserted that setting a value to zero as an initial value is not equivalent to determining an initial steering wheel input, which may or may not be a zero value.

The determination of an initial steering wheel input is a feature of the present invention that allows the model to yield reliable results when it is operated at its dynamic limits. Typically, as disclosed in Rossetter, the steering wheel angle is measured from zero, and as a result, when the model is operated at or near its dynamic limits, it produces unpredictable results. In contrast, the present invention discloses and claims "determining" an initial steering wheel angle. This feature is explained at paragraph [0029] of the specification as involving determination of the initial steering wheel angle from a previous loop. As at least this claimed feature is not disclosed in the Rossetter reference, all of the rejections under 35 U.S.C. §102 should be withdrawn.

Claims 2, 5-7, 11 and 14-16 stand rejected under 35 U.S.C. §103 as being unpatentable over Rossetter in view of O'Brien. The Office Action applies Rossetter as it did to independent claims 1 and 10, and further relies upon O'Brien to teach a maximum slip for a vehicle of 15%. Similarly, claim 19 stands rejected under 35 U.S.C. §103 as being unpatentable over Rossetter in view of Chen because Chen discloses simulating controlling of steering for a vehicle in order to calculate a time to rollover. However, as just discussed, the Rossetter reference fails to disclose or suggest Applicants' determination of an initial steering wheel angle input. Accordingly, for the same reasons as set forth above with respect to independent claims 1 and 10, the rejections under 35 U.S.C. §103, which all rely upon Rossetter, should be withdrawn.

Having overcome all of the objections and rejections set forth in the Office Action, Applicants submit that claims 1-20 are in a condition for allowance. A Notice of Allowance indicating the same is therefore earnestly solicited. The Examiner is invited to telephone the Applicants' undersigned attorney if any unresolved matters remain.

Respectfully Submitted,



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